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*Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

AMANDA GATES,  
Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC;  
NAVIENT; NELNET LOAN SERVICES;  
GREAT LAKES EDUCATIONAL LOAN  
SERVICES; TRANS UNION LLC; AND U.S.  
BANKCORP,  
Defendants.

Case No. 2:19-cv-01710-APG-VCF

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR NAVIENT  
SOLUTIONS, LLC TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

Plaintiff AMANDA GATES ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC, incorrectly named NAVIENT in the Complaint, by and through their respective counsel, stipulate and agree to extend the deadline from October 24, 2019 to November 15, 2019, for Defendant NAVIENT SOLUTIONS, LLC ("NSL"), to File an Answer or Otherwise Respond to Plaintiff's Complaint (ECF No. 1).

On October 1, 2019, Plaintiff filed her Complaint. The claims at issue necessitate additional time for fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so that it can meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action, and therefore requires additional time to investigate the allegations and claims asserted against NSL. Plaintiff has no opposition to NSL's request for an extension until November 15, 2019 to file an answer or otherwise respond to Plaintiff's Complaint.

This is the first stipulation for extension of time for NSL to respond to Plaintiff's Complaint and is being made in good faith and not for purposes of undue delay. No additional requests for

1 extensions are contemplated.

2 **IT IS SO STIPULATED.**

3 Dated this 22nd day of October, 2019.

4 **HOLLEY, DRIGGS, WALCH, FINE,**  
5 **PUZEY, STEIN & THOMPSON**

6 /s/ Michael R. Ayers

7 MICHAEL R. AYERS, ESQ.  
8 800 S. Meadows Parkway, Suite 800  
9 Reno, Nevada 89521

10 *Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

11 Dated this 22nd day of October, 2019

12 /s/ Miles N. Clark

13 MATTHEW I. KNEPPER, ESQ.  
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18 DAVID H. KRIEGER, ESQ.  
19 **HAINES & KRIEGER, LLC**  
20 8985 S. Eastern Avenue, Suite 250  
21 Henderson, Nevada 89123

22 *Attorneys for Plaintiff*

23 **ORDER**

24 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up  
25 to and including November 15, 2019 is so ORDERED AND ADJUDGED.

26 Dated this 23rd day of October, 2019.

27 

28 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on October 22, 2019, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF System and through that service a copy was sent with e-notice to all parties.

By: /s/ SUSAN M. MATEJKO  
An Employee of Holley Driggs Walch Fine, Puzey,  
Stein & Thompson